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November 28, 2005

Docket Clerk
Marketing Order Administrative Branch
Fruit and Vegetable Programs, AMS, USDA
1400 Independence Ave., SW
Stop 0237
Washington, DC 20250

Re: AMS Proposed Rule Docket No. FV03-925-1PR Federal Register Notices of May 25,, p. 30001 July 25, 2005, p. 42513; and September 27, 2005, p. 56278

Dear Sirs,

I believe the question must be asked by the trier of fact in this proceeding the reason the Chilean producers vehemently oppose the April 1 inspection date. Could the answer be that other countries currently have import standards that adversely impact the late season shipments from Chile when inclement weather affects their quality leaving only one market in which to dump this product. I believe that answer to be yes.

There can be no other explanation for *professional* table grape producers to oppose minimum grade standards that are not difficult to attain. A perfect example is the Mexican table grape industry that opposed (608e) meeting the grade standards of Marketing Order 925 and since that time have experienced an explosion in their industry.

I have been producing table grapes for 20 years in the Coachella Valley and have witnessed many changes and have been able to adapt. Those changes have included labor issues, governmental mandates, foreign competition and even changes in quality standards. And I and my peers have been able to meet this changes as profession producers. I would expect no less than from our *peers* in Chile.

Sincerely

Richard Blair